

UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

IN RE: :
:
ACTIVE WORLD HOLDINGS, INC. : CHAPTER 11
d/b/a Active World Club :
:
Debtor, : BKRTCY. NO. 25-11826 pmm
:
:
: HEARING DATE: 6/3/2025
: TIME: 10:00 A.M.

DEBTOR'S MOTION TO CONTINUE, EXTEND AND REIMPOSE AUTOMATIC STAY
UNDER § 362 PURSUANT TO 11 U.S.C. §§ 362(c)(3)(B) and 105 WITH
RESPECT TO DEBTOR'S REAL PROPERTY AND ALL CREDITORS

Debtor files this Motion to Continue, Extend and Reimpose the Automatic Stay as to all Debtor's creditors for the following reasons:

1. Movant is the Debtor, having filed this case on May 8, 2025.

2. Respondents are Debtor's creditors, but specifically WFD Capital LLC and HOF Trust which may have Sheriff's Sales pending or rescheduled regarding Debtor's real estate in Berks county.

3. Debtor filed one prior Chapter 11 case, on August 8, 2024. This case was dismissed because Debtor did not have the present ability, at that time, to put together and fund a Chapter 11 Plan.

4. Debtor believes that this filing will be successful because the theatrical release of the movie "The Performance" is

now imminent and a revenue stream can begin from the sale of collectible NFT's from the executive producer contract with Active World Holdings Inc. It is anticipated that the release will be no later than this summer. The stream of revenue from this project could be in the range of \$1.5 million.

5. There is also a new settlement agreement with the largest secured creditor WFD with a balance now of less than \$150,000.

6. Additionally, there are now lenders willing to advance funds for stock and token loans related to money and shares owed to Debtor AWH from Givbux Inc, a publicly traded company. This can also be monetized into a stream of income.

7. Further, the equity in the real estate is sufficient to refinance and payoff HOF Trust, who was delivered \$25,000 last month to pay down the principal owed, and extend the sheriffs sale.

8. The above changes constitute the substantial change in financial circumstances contemplated by 11 U.S.C. § 362(c)(3)(C)(i)(III) to rebut the presumption that arises under 11 U.S.C. §362(c)(3)C.

9. This case has been filed in good faith, under all the circumstances cited herein, and such other and further matters as may be raised at the hearing of this matter.

10. Debtor requests the Court to continue and extend the automatic stay and allow Debtor to attempt to monetize the various assets in its possession and create and fund a Chapter 11 Plan. Should the Court agree with this request, it is contemplated that a Chapter 11 Plan will be a 'full pay' plan.

WHEREFORE, Debtor respectfully requests that Your Honorable Court grant its Motion to Continue and Extend the Automatic Stay pursuant to Sections 362 and 105 of the Code and for such other and further relief as is just under the circumstances.

Date: 5/14/2025

Respectfully submitted:

**LAW OFFICES OF
KEVIN K. KERCHER, ESQ., P.C.**

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